United States Bankruptcy Court Middle District of Pennsylvania

| In re: | Case No. 1:23-bk-02097-HWV |
|--------------------|----------------------------|
| Brenda Ann Sidler, | Chapter 13 |
| Debtor. | Related to ECF No. 20 |

Debtor's Objection to Motion for Relief from Stay filed by U.S. Bank National Association

AND NOW, Debtor Brenda Ann Sidler, by and through her attorney, hereby objects to the Motion for Relief from Stay filed by U.S. Bank National Association. Because the purported arrearage that gave rise to the Motion can be timely paid directly or through the chapter 13 plan, no grounds for relief exist and the Motion must be denied.

NOW, THEREFORE, the Debtor asks this Court to deny the Motion in the form of order attached and to grant such other and further relief in her favor as may be necessary and proper under the law.

Date: December 7, 2023 CIBIK LAW, P.C. Counsel for Debtor

By: /r/ Michael A. Cibik
Michael A. Cibik (#23110)
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Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com

Certificate of Service

I certify that on this date I caused a true and correct copy of the Debtor's Objection to Motion for Relief from Stay filed by U.S. Bank National Association to be served on all parties on the clerk's service list through the CM/ECF system.

Date: December 7, 2023

/s/ Michael A. Cibik

Michael A. Cibik

UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

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| Brenda Ann Sidler, | Chapter 13 |
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Order Denying Motion for Relief from Stay filed by U.S. Bank National Association

AND NOW, upon consideration of the Motion for Relief from Stay filed by U.S. Bank National Association, and the Debtor's objection thereto, and after notice and hearing, it is hereby **ORDERED** that the Motion is **DENIED**.